

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEAST DIVISION**

JAMIE KAUFMANN WOODS; SHARI LUEKEN, A MINOR,
BY AND THROUGH HER NEXT FRIENDS,
RALPH LUEKEN AND MARILYN LUEKEN; RALPH LUEKEN;
MARILYN LUEKEN; ERIKA TEASLEY, A MINOR,
BY AND THROUGH HER NEXT FRIENDS, PAUL
DOUGLAS ("DOUG") HOOVER JR., AND KATRINA L. HOOVER;
PAUL DOUGLAS ("DOUG") HOOVER JR.; KATRINA HOOVER;
TRACEY BRAZIL OZUNA, JESSICA DEBOI

PLAINTIFFS

vs.

Case No. Case No. 1:03CV00105CAS

BOB WILLS, AKA BOBBY RAY WILLS, AKA W. B. WILLS;
BETTY SUE WILLS; SAM GERHARDT, AKA S.L. GERHARDT;
DEBORAH GERHARDT, AKA DEBBIE GERHARDT,
DBA MOUNTAIN PARK BOARDING ACADEMY;
JULIE GERHARDT; SHARON GOODMAN; and ANDREA HILL

DEFENDANTS

PLAINTIFFS' PRETRIAL

Pursuant to the Court's case management order, Plaintiffs submit witness and exhibit
lists, and other pretrial material.

Judge	Plaintiffs' Attorney	Defendants' Attorney
Charles A. Shaw	Oscar Stilley	John Briggs and Scott Killen
Trial Date(s)	Court Reporter	Courtroom deputy
December 12, 2005	Sue Moran	

A. WITNESSES

1. Jessica Deboi (Will testify)
2. Erika Teasley (Will testify)
3. Shari Lueken (Will testify)
4. Jamie Kaufman Woods (Will testify)
5. Tracy Ozuna (Will testify)
6. Ralph Leuken
7. Marilyn Leuken (Will testify)
8. Jeffrey Kline (Will testify)
9. Sam Gerhardt
10. Deborah Gerhardt
11. Bob Wills
12. Betty Wills
13. Kenda Landsverk (Will testify)
14. Sharon Goodman
15. Andrea Hill
16. Julie Gerhardt

Plaintiffs reserve the right to call other witnesses for purposes of impeachment, to call any Defendant or witness listed by the Defendants, and Plaintiffs reserve the right to supplement this list as necessary.

B. EXHIBITS

Plt Exh #	Description of Plaintiffs' Exhibits	Objection /Ruling
1.	Messenger May/June 2001	
2.	Mountain Park Baptist Church and Boarding Academy Handbook - May 2000	
3.	Photos of Hourly Staff	
4.	Photos of Pastoral Staff	
5.	Article Titled - The Past	
6.	Article of Philosophy, Financial Info, etc.	
7.	Palm Lane Corporation Information Sheet	
8.	Photos of Palm Lane showing fencing	
9.	Sunday Post Dispatch - News Articles - Reform Schools Find A Haven Here; Acting On Faith/Missouri's Unregulated Reform Schools; Schools hail pastor as a hero who redeemed teens (Lester Roloff)	
10.	Corrected Request and Order for Execution Garnishment or Sequestration	
11.	Request and Order for Execution Garnishment or Sequestration	
12.	Interrogatories to Garnishee	
13.	Warranty Deed	
14.	Four Seasons Cottages	
15.	State Set to Remove 120 from Hattiesburg Home for Girls	
16.	Deputies Seal Off Bethesda Home: 120 Girls in State's Care	
17.	Hearing Slated Today for Few Teens Remaining at Girls Home	
18.	Home Rules Girls' Paddling Based on Biblical Principle	
19.	Parents Seek Probe of Bethesda Takeover	
20.	Bethesda to Change Little as Baptist Academy	
21.	Judge Releases Records on Bethesda Takeover	

Plt Exh #	Description of Plaintiffs' Exhibits	Objection /Ruling
22.	Bethesda Takeover Sparks Debate Over Licensing	
23.	Continuation : Bethesda Takeover Sparks Debate Over Licensing	
24.	Bethesda Flap Unresolved	
25.	Custody of Bethesda Runaway Unclear	
26.	Head of Girls School Tries to Change Image	
27.	State's Child Care Laws Said Weakest in US	
28.	Letters Urge Allain to Halt Regulation of Church Homes	
29.	Hattiesburg Girls Home Ordered to Open Records on Teens	
30.	Trial to Start for Operator of Girls Home	
31.	Former Resident of Girls Home Files Suit Against Operators	
32.	Ex-Residents of Girls Home Tell of Paddlings, Hunger	
33.	Continuation: Ex-Residents of Girls Home Tell of Paddlings	
34.	Ex-Bethesda Home Girls Report Medical Problems, to Little Food	
35.	Bethesda Spurs Mixed View on Church-State Separation	
36.	FBI Begins Investigation Into Girls Home	
37.	Suitz Resident was "Scarred" at Girls Home	
38.	Baptists Refuse to Act on Closure of Bethesda	
39.	Operator of Former Girls Home to Leave for Another Ministry	
40.	Bethesda - The Proposed Settlement	
41.	Farewell	
42.	Welfare Head Calls Bethesda Policies "Abusive, Neglectful"	
43.	Wills': Welfare Head's Statement "Not True"	
44.	Minister Files \$44 Million Bethesda Suit	
45.	Continuation: Minister Files \$44 Million Bethesda Suit	
46.	Court Records Cite Deficiencies at Girls School	

Plt Exh #	Description of Plaintiffs' Exhibits	Objection /Ruling
47.	Church Home Operator Wants Restrictions Lifted	
48.	Operator of Girls Home Challenges Court's Power	
49.	Grand Jury Won't Halt Probe Into Girls' Home	
50.	Court Upholds Charges in Bethesda Home Case	
51.	State Weighs Oversight of Child Facilities	
52.	Judge to Consider if Officials Immune from \$44 Million Lawsuit	
53.	Teen Slain at MO Bible School Ran By Former Mississippi Pastor	
54.	Plot to Take Over School Led to Slaying of Student	
55.	Jessica Brazil - Enrollment Application	
56.	Jessica Brazil - Power of Attorney	
57.	Jessica Brazil - Medication Log	
58.	Jessica Brazil - Visitation Requests, Staff Follow-up Notes	
59.	Jessica Brazil - General Enrollment Forms	
60.	Shari Lueken - Enrollment Application	
61.	Shari Lueken - Power of Attorney	
62.	Shari Lueken - Medication Log	
63.	Shari Lueken - Visitation Requests, Staff Follow-up Notes	
64.	Shari Lueken - General Enrollment Forms	
65.	Tracey Brazil - Enrollment Application	
66.	Tracey Brazil - Power of Attorney	
67.	Tracey Brazil - Medication Log	
68.	Tracey Brazil - General Enrollment Forms	
69.	Erika Teasley - Enrollment Application	
70.	Erika Teasley - Power of Attorney	

Plt Exh #	Description of Plaintiffs' Exhibits	Objection /Ruling
71.	Erika Teasley - Medication Log	
72.	Erika Teasley - Visitation Requests, Staff Follow-up Notes	
73.	Erika Teasley - General Enrollment Forms	
74.	Erika Teasley - Drug Tests - Lab Corp of America/Toxicology	
75.	Erika Teasley - POA Revocation	
76.	Erika Teasley - Letters to family members	
77.	Jamie Kaufmann - Enrollment Application	
78.	Jamie Kaufmann - Power of Attorney	
79.	Jamie Kaufmann - Medication Log	
80.	Jamie Kaufmann - Visitation Requests, Staff Follow-up Notes	
81.	Jamie Kaufmann - General Enrollment Forms	
82.	Expert report of Dr. Kline	
83.	Expert report of Ben Corpus	

Plaintiffs reserve the right to supplement their Exhibit List, and Plaintiffs reserve the right to refer to exhibits offered by Defendants.

C. DEPOSITIONS, INTERROGATORY ANSWERS, REQUESTS FOR ADMISSION

At this time, Plaintiffs have no excerpts that they intend to read into the record at trial.

However, Plaintiffs reserve the right to use deposition excerpts for purposes of impeachment during witness examination. Plaintiffs also reserve the right to supplement their disclosure as necessary.

D. JURY INSTRUCTIONS

Submitted separately. Plaintiffs reserve the right to supplement with instructions related to any claims now dismissed, or reinstated sua sponte or pursuant to motion of the Plaintiff.

E. TRIAL BRIEF

Submitted separately.

By: /s/ Oscar Stilley
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Fort Smith, AR 72916
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I, Oscar Stilley, by my signature above certify that I have this November 22, 2005 served the defendants with a copy of this pleading electronically by CM/ECF to: John Oliver, Attorney at law, Oliver, Oliver, & Waltz, PO Box 559, Cape Girardeau, MO, 63702-0559; and John Briggs, Attorney at law, Brown & James, P.C., 1010 Market Street, 20th Floor, St. Louis MO 63101-2000.